

IN THE UNITED STATES DISTRICT COURT  
FOR THE STATE OF NEW MEXICO

STATE OF NEW MEXICO, *ex rel.*  
State Engineer

Plaintiff,

v.

RAMON ARAGON, *et al.*,

Defendants.

P-1-241  
UNITED STATES DISTRICT COURT  
DISTRICT OF NEW MEXICO

02 APR 24 PM 2:35  
*[Signature]*

69cv07941 JEC-JACE  
SLET-SANTA FE

RIO CHAMA STREAM SYSTEM  
Section 7: Rito de Tierra Amarilla,  
Rio Brazos, Rutherford/Plaza  
Blanca, Cañones Creek, Village of  
Chama

**NEW MEXICO'S MOTION TO JOIN  
ADDITIONAL PARTIES DEFENDANT**

COMES NOW plaintiff State of New Mexico, *ex rel.* State Engineer ("State") and respectfully requests the Court to join as additional parties defendant the persons or entities named below and order them to answer the State's Complaint in this action as required in any civil action in the United States District Court or suffer default judgment against them. In support of this motion, the State asserts:

1. The persons listed in Exhibit A attached hereto are diverting and using or may claim the right to divert and use surface or underground waters within the Rio Chama Basin. These waters belong to the public and are subject to appropriation in accordance with the laws of the state. This Court has exclusive jurisdiction of adjudicate all claims to the right to divert, store, or use public waters in the Rio Chama Basin.

2. The persons or entities listed in Exhibit A are in Section 7 of the Rio Chama Stream System, and may be diverting and using water associated with the subfile numbers listed, or may otherwise be using and diverting surface or underground waters within Section 7 of the Rio Chama

6664

Stream System.

DATED: April 23, 2002

Respectfully submitted,

Ed Newville

EDWARD G. NEWVILLE  
Special Assistant Attorney General  
Office of the State Engineer  
P.O. Box 25102  
Santa Fe, NM 87504-5102  
(505) 827-6150

**CERTIFICATE OF SERVICE**

I certify that a copy of New Mexico's Motion to Join Additional Parties Defendant was mailed to the following persons on April 24, 2002.

Edn

Edward G. Newville

RIO CHAMA SECTION 7  
DISTRIBUTION LIST

Special Master Vickie L. Gabin  
USDC-DCNM  
P.O. Box 2384  
Santa Fe, NM 87504-2384

Darcy S. Bushnell, Esq.  
Adjudication Staff Attorney  
USDC-DCNM  
333 Lomas Blvd. NW, Suite 270  
Albuquerque, NM 87102-2272

Karla McCall, Data Manager.  
1315 Sagebrush Dr. SW  
Los Lunas, NM 87031

Bradley S. Bridgewater, Esq.  
David W. Gehlert, Esq.  
USDOJ-ENRD  
999 18th St., Suite 945  
Denver, CO 80202

John W. Utton, Esq.  
P.O. Box 271  
Albuquerque, NM 87103-0271

Wilfred Gutierrez, Chair  
NM Acequia Commission  
P.O. Box 190  
Velarde, NM 87582

Paula Garcia  
NM Acequia Association  
P.O. Box 1229  
Santa Cruz, NM 87567

Benjamin Philips, Esq.  
John F. McCarthy, Jr., Esq.  
Rebecca Dempsey, Esq.  
White, Kock, Kelly & McCarthy, P.A.  
P.O. Box 787  
Santa Fe, NM 87504-0787

Lester K. Taylor, Esq.  
Nordhaus, Haltom, Taylor, Taradash & Bladh, LLP  
500 Marquette, NW  
Suite 1050  
Albuquerque, NM 87102

Susan G. Jordan, Esq.  
Nordhaus, Haltom, Taylor, Taradash & Bladh, LLP  
200 West DeVargas, Suite 9  
Santa Fe, NM 87501

Tessa T. Davidson  
Swain, Schrantdt & Davidson, P.C.  
4830 Juan Tabo, N.E., Suite F  
Albuquerque, NM 87111

Marcus J. Rael, Esq.  
3208 Vista Maravillosa, N.W.  
Albuquerque, NM 87120

**EXHIBIT A**

<u>DEFENDANT</u>	<u>SUBFILE NO.</u>	<u>ADDRESS</u>
Nicholas C. C de Baca	CHTA-003-0045	P.O. Box 9107, Bernalillo NM 87004
Jaimie Trujillo	CHTA-004-0005C	#18 Blue Canyon Vista, Santa Fe NM 87501
Doris Trujillo	CHTA-004-0005C	#18 Blue Canyon Vista, Santa Fe NM 87501
Josephine U. Kiser	CHTA-004-0005B	6601 Arden Rd., #247, Amarillo TX 79109
Simonita Trujillo	CHTA-004-0005A	910 Rio Vista, Santa Fe NM 87501
Michael S. Garcia	CHTA-003-0027	HC 75, Box 126, Tierra Amarilla NM 87575
J. Placido Garcia, Jr.	CHRB-003-0001	5809 Royal Oak Rd., N.E. ABQ NM 87111
Munira K. Garcia	CHRB-003-0001	5809 Royal Oak Rd., N.E. ABQ NM 87111
J. Patrick Garcia	CHRB-003-0001	8821 Harwood N.E., ABQ NM 87111
Anthony T. Garcia	CHRB-003-0001	P.O. Box 250, Velarde NM 87582
Debbie L. Garcia	CHRB-003-0001	P.O. Box 250, Velarde NM 87582
Adel Gomez	CHRB-003-0003	P.O. Box 208, Lumberton NM 87528
Manuel F. Valdez	CHRB-003-0010	P.O. Box 56, Los Ojos NM 87551
Gloria C. Valdez	CHRB-003-0010	P.O. Box 56, Los Ojos NM 87551
Theresa Valdez	CHRB-003-0010	P.O. Box 56, Los Ojos NM 87551
Dolores L. Maez	CHRB-006-0032	P.O. Box 144, Abiquiu NM 87510
Emery Maez	CHRB-006-0032	P.O. Box 144, Abiquiu NM 87510